

Ballard Spahr LLP

919 North Market Street, 11th Floor
Wilmington, DE 19801-3034
TEL 302.252.4465
FAX 302.252.4466
www.ballardspahr.com

Beth Moskow-Schnoll
Tel: 302.252.4447
moskowb@ballardspahr.com

Lauren P. Russell
Tel: 202.661.7605
russelll@ballardspahr.com

May 29, 2024

VIA ECF

The Honorable Maryellen Noreika
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801

Re: *United States v. Robert Hunter Biden*, Criminal Action No. 23-61-MN

Dear Judge Noreika:

This firm represents a coalition of local and national news media organizations (the “Press Coalition”)¹ that have reported on the above-captioned prosecution of Robert Hunter Biden, son of President Joseph R. Biden, Jr. Attached please find the Press Coalition’s Motion to Intervene and for In-Person Access to Jury Selection in this matter, along with a Proposed Order.

The Press Coalition respectfully requests that the Court address its motion on an expedited basis before June 3, 2024, when jury selection is set to begin. Absent expedited consideration, the press and public may be denied the First Amendment right to observe jury selection in person, which cannot be cured after the fact and may constitute reversible error. The Press Coalition further requests oral argument on its motion pursuant to Local Rule 7.1.4. Counsel for the Press Coalition is prepared to address the issues discussed in the attached motion at the Court’s convenience.

Respectfully submitted,

/s/ *Beth Moskow-Schnoll*

Beth Moskow-Schnoll (# 2900)
Lauren P. Russell (# 6576)

¹ The coalition includes American Broadcasting Companies, Inc. d/b/a ABC News, the Associated Press, Cable News Network, Inc., CBS Broadcasting Inc. o/b/o CBS News, Dow Jones & Company, Inc., publisher of The Wall Street Journal, Gannett Co., Inc., the ultimate parent company of The News Journal and DelawareOnline.com, National Public Radio, Inc., NBCUniversal Media, LLC d/b/a NBCUniversal News Group, The New York Times Company, POLITICO LLC, and WP Company LLC d/b/a The Washington Post.